

09 April 2019

Mr. Bob Morse
USEPA Region II
Superfund Federal Facilities Section
290 Broadway, Floor 18
New York, NY 10007-1866

Ms. Melissa Sweet
New York State Department of Environmental Conservation (NYSDEC)
Division of Environmental Remediation
625 Broadway
Albany, NY 12233-7015

Mr. Mark Sergott
Bureau of Environmental Exposure Investigation
New York State Department of Health, Room 300
Flanigan Square, 547 River Street
Troy, NY 12180-2216

SUBJECT: Thirty (30) Day Notice of Intent to Proceed with the Expanded Site Investigation Groundwater Sampling for Per- and Polyfluoroalkyl Substances (PFAS) at SEAD 25 (Fire Training and Demonstration Pad) and SEAD 26 (Fire Training Pit) (Contract W912DY-09-D-0062, Task Order #23), Seneca Army Depot Activity, Romulus, New York

Dear Mr. Morse/Ms. Sweet/Mr. Sergott:

On behalf of the Army, Parsons Federal (Parsons) plans to initiate the Expanded Site Inspection (ESI) PFAS drilling and groundwater sampling program at SEADs 25 and 26 within Seneca Army Depot Activity, Romulus, NY. It is intended that the drilling and groundwater sampling program will begin on 06 May 2019. The proposed schedule (see attached) is to begin drilling the on 06 May 2019 by staging decon pads and beginning well installations at the former Fire House within the Administration area north of SEAD 25. Well installation will then proceed to SEAD 25 and SEAD 26. The wells will then be developed and groundwater sampling will begin. Two surface water samples will be collected as time permits.


Drilling and groundwater sampling will be conducted based on the procedures specified in the Final UFP-QAPP (Parsons, 2017), Addendum 1 to the Final UFP-QAPP (Parsons, 2018) and the Final Work Plan for the PFAS Expanded Site Investigation, SEAD 25 and SEAD 26, SEDA (Parsons, 2019). Parsons anticipates that the proposed primary drilling and groundwater sampling can be completed in approximately three weeks.



- Proposed work plan deviation: With concurrence from the EPA and the NYSDEC, the Army proposes installation of flush mount well completions at all well locations instead of the proposed stick-up construction. The well vault shall be set in cement with a 6-inch-thick by 2-ft by 2-ft square concrete surface pad. The surface of the pad will be sloped away from the well vault to facilitate drainage. The annulus around the well casing and the well vault's skirt should be backfilled with sand suitable to permit drainage of any moisture that accumulates in the well vault below the vault skirt to prevent flooding into the monitoring well. Two inches of soil will be removed from around the wellhead in the surface pad footprint prior to pouring the cement pad. The casing shall be installed in a manner that does not hinder access to the monitoring well for purposes of cap removal, taking samples, or water level measurements. The lid shall be designed to prevent water from entering the protective casing and be bolted in place.
- Spring Meadows: Two of the proposed SEAD 25 well drilling locations are located between the Spring Meadows apartments and SEAD 25 (see attached Figure). The Army will access these areas from the Depot side.

Should you have any questions, please do not hesitate to call me at (617) 449-1565 or via email at beth.badik@parsons.com to discuss them.

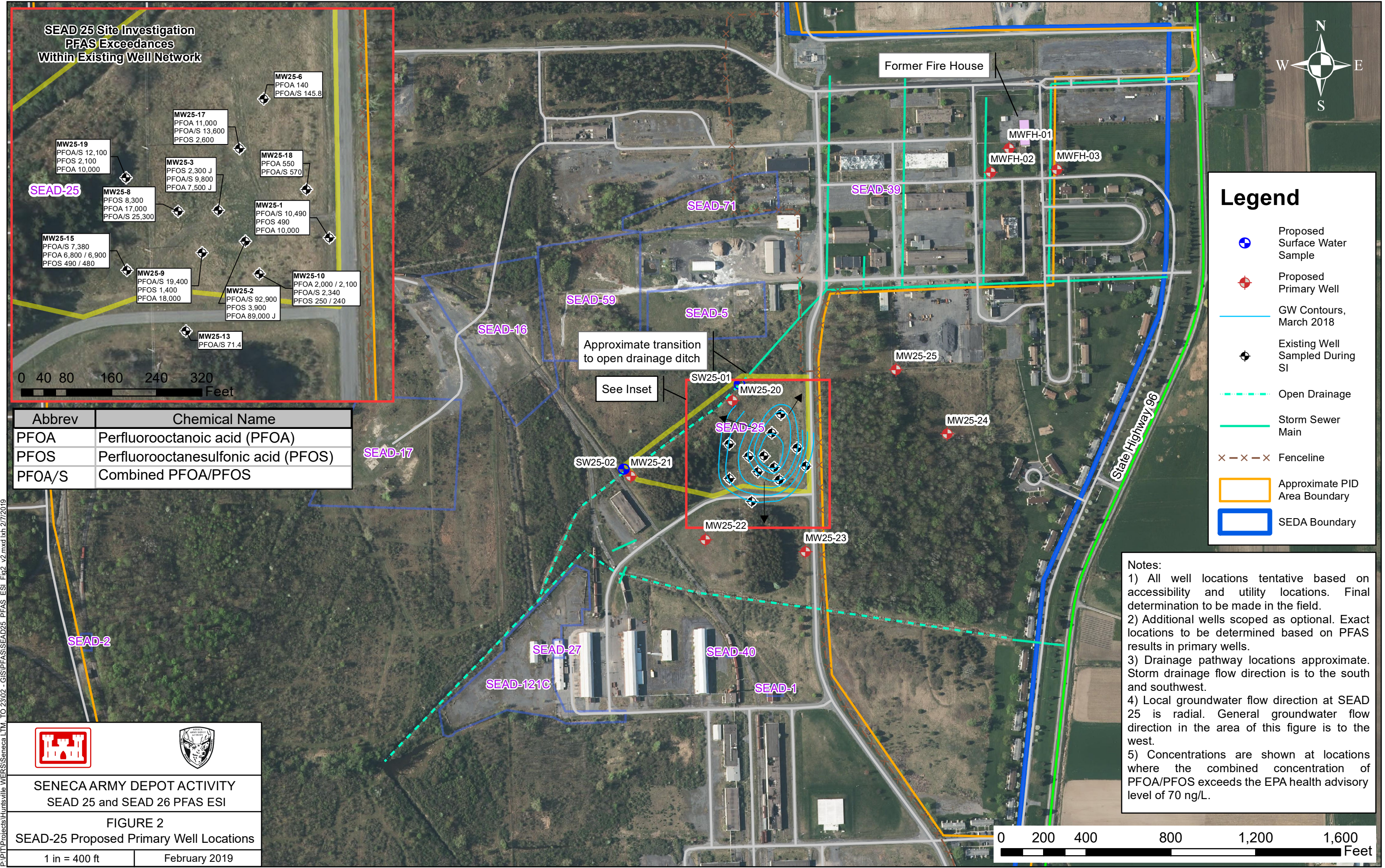
Sincerely,



Beth Badik
Project Manager

cc: R. Battaglia, USACE, NY District
D. Pommerenck, USACE Huntsville
C. Heaton, USACE Huntsville
B. Hodges, USACE Huntsville
Spring Meadows Apartments
Town of Romulus





**SEAD 25 Site Investigation
PFAS Exceedances
Within Existing Well Network**

MW25-19 PFOA/S 12,100 PFOS 2,100 PFOA 10,000	MW25-17 PFOA 11,000 PFOA/S 13,600 PFOS 2,600	MW25-18 PFOA 550 PFOA/S 570
MW25-8 PFOA 8,300 PFOA/S 17,000 PFOA/S 25,300	MW25-3 PFOS 2,300 J PFOA/S 9,800 PFOA 7,500 J	MW25-1 PFOA/S 10,490 PFOS 490 PFOA 10,000
MW25-15 PFOA/S 7,380 PFOA 6,800 / 6,900 PFOS 490 / 480	MW25-9 PFOA/S 19,400 PFOS 1,400 PFOA 18,000	MW25-10 PFOA 2,000 / 2,100 PFOA/S 2,340 PFOS 250 / 240
	MW25-2 PFOA/S 92,900 PFOS 3,900 PFOA 89,000 J	
	MW25-13 PFOA/S 71.4	

0 40 80 160 240 320 Feet

Abbrev	Chemical Name
PFOA	Perfluorooctanoic acid (PFOA)
PFOS	Perfluorooctanesulfonic acid (PFOS)
PFOA/S	Combined PFOA/PFOS

Legend

- Proposed Surface Water Sample
- Proposed Primary Well
- GW Contours, March 2018
- Existing Well Sampled During SI
- Open Drainage
- Storm Sewer Main
- Fenceline
- Approximate PID Area Boundary
- SEDA Boundary

Notes:



1) All well locations tentative based on accessibility and utility locations. Final determination to be made in the field.

2) Additional wells scoped as optional. Exact locations to be determined based on PFAS results in primary wells.

3) Drainage pathway locations approximate. Storm drainage flow direction is to the south and southwest.

4) Local groundwater flow direction at SEAD 25 is radial. General groundwater flow direction in the area of this figure is to the west.

5) Concentrations are shown at locations where the combined concentration of PFOA/PFOS exceeds the EPA health advisory level of 70 ng/L.



SENECA ARMY DEPOT ACTIVITY
SEAD 25 and SEAD 26 PFAS ESI

FIGURE 2
SEAD-25 Proposed Primary Well Locations

1 in = 400 ft February 2019

P:\PI\P\Projects\Huntsville\WERS\Senecca LTM TO 2302 - GIS\PFAS\SEAD25 PFAS ESI Fig2 v2.mxd kth 2/7/2019

Preliminary Schedule - SEDA PFAS ESI
Seneca Army Depot Activity

ID	Task Name	Duration	Start	Finish	Predecessors	2019														2020					
						April		May		June		July		August		September		October		November		December		January	
						1	4/7	4/21	5/5	5/19	6/2	6/16	6/30	7/14	7/28	8/11	8/25	9/8	9/22	10/6	10/20	11/3	11/17	12/1	12/15
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Project: Seneca PFAS ESI

Date: Tue 4/9/19

Task		Project Summary		Manual Task		Start-only		Deadline	
Split		Inactive Task		Duration-only		Finish-only		Progress	
Milestone		Inactive Milestone		Manual Summary Rollup		External Tasks		Manual Progress	
Summary		Inactive Summary		Manual Summary		External Milestone			

Preliminary Schedule - SEDA PFAS ESI
Seneca Army Depot Activity

[illegible]

Project: Seneca PFAS ESI

Date: Tue 4/9/19

Task		Project Summary		Manual Task		Start-only		Deadline	
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